

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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IN RE:

MELVIN DEWAYNE PARKER,

CASE NO. 16-26482-E

Debtor.

CHAPTER 13

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MOTION TO AMEND CHAPTER 13 PLAN

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Comes now the debtor, Melvin Parker, and would respectfully move this Honorable Court to amend his Chapter 13 plan by reducing his Chapter 13 payments from \$417.00 per week to \$200.00 per week, and by increasing the mortgage arrearage claim of Paper Assets Capital from \$1.00 to \$10,000.00 to be paid at the rate of \$500.00 per month, and by deleting mortgager BSI, successor in interest of Specialized Loan Servicing, LLC, thereafter Shellpoint, and would support said motion as follows:

1. That the Debtor's employment work hours have been significantly reduced which as resulted in net weekly paychecks of between \$50.00 and \$100.00, which is not sufficient to live on, and, in addition, the Debtor's wife has separated from him, which has greatly diminished the household income.
2. That the mortgage loan allegedly owing to BSI has been paid in full by the Debtor through his Chapter 13 plan to Specialized Loan Servicing, LLC, which thereafter assigned the debt to BSI. Even though there is a \$0.00 balance owing, BSI has deliberately and improperly filed a mortgage arrearage claim, despite being fully advised, and has been receiving over payments from the Chapter 13 Trustee.

3. That the Debtor and Paper Assets Capital have allegedly settled the existing dispute, which involves payment of the second mortgage debt through the Debtor's Chapter 13 plan after the initial mortgage arrearage claim of Specialized Loan Servicing, LLC was paid in full, which has been completed.

RESPECTFULLY SUBMITTED:

/s/Andrew E. Bender  
Andrew E. Bender  
Attorney for the Debtor  
382 Washington Avenue  
Memphis, TN 38105  
901-526-1568

CERTIFICATE OF SERVICE

I, ANDREW E. BENDER, do hereby certify that I have sent a copy of the foregoing Motion to all entities on the matrix by US Mail, postage prepaid, this 22<sup>nd</sup> day of April, 2019.

/s/Andrew. E. Bender